

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL INDUSTRY)	MDL No. 1456
AVERAGE WHOLESALE PRICE)	Master File No. 1:01-CV-12257-PBS
LITIGATION)	Sub-Category Case No. 1:08-CV-11200
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)	
THIS DOCUMENT RELATES TO)	Judge Patti B. Saris
<i>United States ex rel. Linnette Sun and Greg</i>)	
<i>Hamilton, Relators</i>)	
<i>v.</i>)	
<i>Baxter Healthcare Corporation,</i>)	
)	

RELATOR LINNETTE SUN'S PRIVILEGE LOG
IDENTIFYING EMAIL ATTACHMENTS SOUGHT IN
BAXTER HEALTHCARE CORPORATION'S MOTION TO COMPEL
RESPONSE TO INTERROGATORY AND PRODUCTION OF DOCUMENTS

Baxter's Motion to Compel seeks, among other items, various attachments to emails previously produced by Relator Linnette Sun. By way of a supplemental production, Relator has produced those attachments with the exception of the attachments listed below. The attachments listed below are being withheld on grounds of privacy, confidential and proprietary information, on the grounds that they are covered by confidentiality provisions in agreements entered into between Relator and third parties, and on the grounds that these documents are not relevant in that they do not provide any information relevant to Relator's wage loss claims in this litigation.

1. Projects Specific for Zevalin EC Initiatives[attachment to email LS-DFP1-000114][1 page]
2. Zevalin Health Economics Communication Plan DRAFT dated June 2, 2004[attachment to email LS-DFP1-000116][10 pages];
3. Zevalin Report[attachment 1 to email LS-DFP1-000117][54 pages]
4. Zevalin Executive Summary Report[attachment 2 to email LS-DFP1-000117][3 pages]
5. Zevalin model slides[attachment 3 to email LS-DFP1-000117][6 pages]
6. Zevalin model slides[attachment 4 to email LS-DFP1-000117][9 pages]
7. Primolux Economic Assessment Proposal submitted by Linnette Sun to Connectics [attachment to LS-DFP1-000120, 121, 129, 162 and 182][3 pages]
8. Work description document for April 2004[attachment to email LS=DFP1-000136,137][1 page]
9. Reimbursement Slides[attachment to email LS=DFP1-000168][3 pages]
10. Price models[attachment to LS-DFP1-000172-173][2 pages]
11. Services Agreement between Linnette Sun and Connectics Corporation dated July 31, 2006 which includes a Confidentiality provision [attachment to email LS-DFP1-000240, 241, 242, 593][7 pages]
12. Model Structure documents undated [attachment to LS-DFP1-000375, 384, 392, 393 and 459][14 pages]

13. Budget Impact Model Proposal dated November 12,2004 submitted by Linnette Sun to Biogen Iden [attachment to LS-DFP1-000451][3 pages]
14. AT Model documents[attachment to email LS-DFP1-000459][3 pages]
15. Drug model slides[attachment to email LS-DFP1-000465, 466][5 pages]
16. Pricing documents on Primolux[attachment to email LS-DFP1-000505][2 pages]
17. Drug model slides[attachment to email LS-DFP-1-000538][5 pages]
18. Drug pricing model documents [attachment to email LS-DFP1-000555][25 pages]
19. Drug Price Lists[attachment to email LS-DFP1-000563][2 pages]
20. November 17, 2003 letter from Linnette Sun to Incyte Corporation along with Consulting Agreement that contains Confidentiality provision [attachment to email LS-DFP1-000573, 574][10 pages]
21. Clindamycin Foam Formulation Consulting Projects proposal dated February 26, 2004 submitted by Linnette Sun to Connetics Corporation [attachment to email LS-DFP1-000577][3 pages]
22. Pricing documents [attachment to email LS-DFP1-000694] [24 pages].

November 18, 2011

Respectfully submitted.

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Counsel for Relators Linnette Sun and
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CERTIFICATION OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **RELATOR LINNETTE SUN'S PRIVILEGE LOG IDENTIFYING EMAIL ATTACHMENTS SOUGHT IN BAXTER HEALTHCARE CORPORATION'S MOTION TO COMPEL RESPONSE TO INTERROGATORY AND PRODUCTION OF DOCUMENTS** to be served on all counsel of record by electronic service by sending a copy to LexisNexis File & Serve for posting and notification to all parties on November 18, 2011.

/s/ Mark Allen Kleiman
MARK ALLEN KLEIMAN